

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-00353-LJL

DECLARATION OF AARON E. NATHAN
IN SUPPORT OF PLAINTIFFS' MOTION AND OBJECTION TO CLAIM OF
EXEMPTION AS TO FUNDS HELD AT PARKSIDE FINANCIAL BANK AND TRUST

I, Aaron E. Nathan, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.

2. Attached as Exhibit 1 is a true and correct copy of Defendant's Opposition to the Motion of the Unsecured Creditors Committee for an Entry of an Order Directing the Immediate Appointment of a Trustee Pursuant to 11 U.S.C. § 1104, filed in *In re Giuliani*, No. 23-12055, ECF No. 250 (Bankr. S.D.N.Y. June 10, 2024).

3. Attached as Exhibit 2 is a true and correct copy of an agreement between Burke Brands LLC and "Rudolph Giuliani, aka Giuliani Communications LLC," produced in response to an information subpoena served on Burke Brands LLC.

4. On August 5, 2024, I caused an Information Subpoena with Restraining Notice to be served on Defendant via certified mail, return receipt requested. The deadline to respond to that information subpoena with restraining notice was August 15, 2024. As of this filing,

Defendant has not responded. A true and correct copy of the Giuliani Information Subpoena with Restraining Notice is attached hereto as Exhibit 3.

5. Attached as Exhibit 4 is a true and correct copy of an Information Subpoena with Restraining Notice dated August 5, 2024, issued to Parkside Financial Bank & Trust, which was served on Parkside no later than August 13, 2024, when counsel for Parkside accepted service via email in writing.

6. On September 10, 2024, Rudolph W. Giuliani, through his representative Theodore Goodman, caused an Exemption Claim Form pertaining to an account at Parkside ending in x7580 to be served on Plaintiffs' by personal delivery to Plaintiffs' counsel (the "Parkside Exemption Claim Form"). A true and correct copy of the Parkside Exemption Claim Form is attached as Exhibit 5.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 17, 2024.

s/ Aaron E. Nathan
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